

# **EXHIBIT 3**

**From:** [Frank Cornelius](#)  
**To:** [Pritchard, J. Scott](#)  
**Cc:** [Jana Hartman](#); [Mitchell West](#); [Nadine Christian-Brittain](#); [Rubin, Michael P.](#); [walters@lowegrahamjones.com](#); [Lisa Elliott](#); [Harris, Alissa N.](#)  
**Subject:** RE: Wolfclan v. Pierce County (C23-5399-TSZ-SKV) - Custodians/Databases Follow up  
**Date:** Thursday, June 20, 2024 8:09:11 AM  
**Attachments:** [image002.png](#)

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Good morning. Without waiving objections to Plaintiff's current discovery requests, please see below initial custodian/database identification.

- **Custodian(s):** Sheriff's Dept./Jail; Facilities Management; Information Technology (IT) Dept.
- **Database:** Email/Outlook boxes and MS Team Chats for Ed Troyer, Patti Jackson, Matthew Dobson, Anthony Mastendrea
- **Search terms and searches (Plt. to identify applicable Interrog./RFP):** toilet, plumbing, backflow, overflow (Plaintiff to provide any additional proposed search terms)

Please advise.

**Frank Cornelius**  
**Deputy Prosecuting Attorney | Civil Litigation**  
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**From:** Frank Cornelius  
**Sent:** Monday, June 17, 2024 8:17 AM  
**To:** Pritchard, J. Scott <[scott.pritchard@stoel.com](mailto:scott.pritchard@stoel.com)>  
**Cc:** Jana Hartman <[jana.hartman@piercecountywa.gov](mailto:jana.hartman@piercecountywa.gov)>; Mitchell West <[west@lowegrahamjones.com](mailto:west@lowegrahamjones.com)>; Nadine Christian-Brittain <[nadine.christian-brittain@piercecountywa.gov](mailto:nadine.christian-brittain@piercecountywa.gov)>; Rubin, Michael P. <[michael.rubin@stoel.com](mailto:michael.rubin@stoel.com)>; walters@lowegrahamjones.com; Lisa Elliott <[lmarieloybal@gmail.com](mailto:lmarieloybal@gmail.com)>; Harris, Alissa N. <[alii.harris@stoel.com](mailto:alii.harris@stoel.com)>  
**Subject:** RE: Wolfclan v. Pierce County (C23-5399-TSZ-SKV) - Custodians/Databases Follow up

Good morning Scott. Sorry for the delay. My goal is to get information to you early this week and I will follow up by Wednesday.

**Frank Cornelius**

**Deputy Prosecuting Attorney | Civil Litigation**

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**From:** Pritchard, J. Scott <[scott.pritchard@stoel.com](mailto:scott.pritchard@stoel.com)>

**Sent:** Monday, June 17, 2024 8:15 AM

**To:** Frank Cornelius <[frank.cornelius@piercecounitywa.gov](mailto:frank.cornelius@piercecounitywa.gov)>

**Cc:** Jana Hartman <[jana.hartman@piercecounitywa.gov](mailto:jana.hartman@piercecounitywa.gov)>; Mitchell West <[west@lowegrahamjones.com](mailto:west@lowegrahamjones.com)>; Nadine Christian-Brittain <[nadine.christian-brittain@piercecounitywa.gov](mailto:nadine.christian-brittain@piercecounitywa.gov)>; Rubin, Michael P. <[michael.rubin@stoel.com](mailto:michael.rubin@stoel.com)>; [walters@lowegrahamjones.com](mailto:walters@lowegrahamjones.com); Lisa Elliott <[lmariroybal@gmail.com](mailto:lmariroybal@gmail.com)>; Harris, Alissa N. <[ali.harris@stoel.com](mailto:ali.harris@stoel.com)>

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Hi Frank,

Just checking in on your disclosure regarding custodians and databases. At our June 10<sup>th</sup> conference, you had committed to sending us something by Friday, June 14. Please let us know when we can expect it.

Thanks,

Scott

**Scott Pritchard** | Partner

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